

Appendix L

U.S. Coast Guard Comments on DEIS

U.S. Department
of Transportation

United States
Coast Guard



Commanding Officer
United States Coast Guard
Vessel Traffic Service Puget Sound

1519 Alaskan Way South
Seattle, WA 98134-1192
Staff Symbol:
Phone: (206) 217 - 6040
FAX: (206) 217 - 6900

16000
May 4, 2000

Mr. Chris Cziesla
%Jones & Stokes
2820 Northup Way
Suite 100
Bellevue, WA 98004-1419

Dear Mr. Cziesla:

Thank you for your letter requesting clarification on the statistics contained in my letter dated 25 April 2000 concerning the Maury Island Environmental Impact Statement. I agree that the wording contained in paragraph eleven could be misinterpreted if not compared to the data provided in the enclosure. You may change the sentence in my original letter, paragraph eleven to read "Over 97% of the Deep Draft vessels which participate with the VTS transit East Passage..."

You are welcome to include all of our correspondence in the appendix of the final Environmental Impact Statement.

A handwritten signature in dark ink, appearing to read "G. F. Greene".

G. F. GREENE
Captain, U.S. Coast Guard
Vessel Traffic Service Puget Sound
Commanding Officer

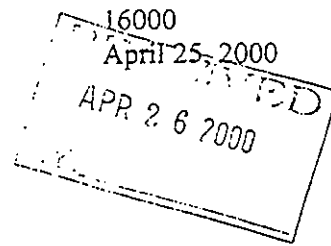
Copy: US Coast Guard Captain of the Port (COTP)
President, Puget Sound Pilots Association
Chair, Puget Sound Marine Committee

Encl (1): My original letter dated April 25, 2000

This page left blank intentionally.



Jones & Stokes
2820 Northrup Way
Suite 100
Bellevue, WA 98004-1419



Dear Sir or Madam:

This letter is in response to your 6 March 2000 request for comment on the Draft Environmental Impact Statement (EIS) for the gravel mining operation proposed for the southeast shoreline of Maury Island.

Based on the information provided in your letter and the Draft EIS, I concur with your determination that the existing traffic Management Regime can safely manage up to four 10,000-ton barges arriving and departing from the site per day (for a total of 8 daily transits). If smaller barges were used, resulting in a significant increase in the number of transits, or in the number of barges/tugs anchoring or loitering in the vicinity of the mine site, it would be necessary to reconsider this determination.

Although Vessel Traffic Service Puget Sound (VTSPS) can effectively mitigate the impact of this increased barge activity; any increase in traffic, particularly traffic that crosses the traffic lanes, will marginally increase the absolute risk of the waterway. I therefore disagree with the characterization in section 8.8.2.3 of the Draft EIS where it states: "Due to the slow speed of these vessels, the number of towed barges through the East Passage is not critical to the safety risk. They have considerable time to respond to obstacles, and other vessels have considerable time to respond to them."

I believe this is an over simplification. It is generally true that vessels moving at slower speeds have more time to detect an obstacle, and to take appropriate action under the International Collision Regulations (COLREGS). However, it is also true that a slow moving tug/barge will take longer to cross the traffic lanes, thus increasing their exposure to fast moving ships. A slow moving tug with a barge either along side or towed astern is also less capable of taking timely evasive actions should the need arise.

Vessel speed is only a relevant factor for collisions, and to a lesser extent powered groundings. The speed of a vessel has very little to do with the risk of drift groundings. If a tug/barge operating near the shoreline, were to lose power, or part the towline, there is significant risk of the tug and or barge grounding.

As identified in section 8.3.2.2 of the EIS, perhaps the greatest risk will be for loaded barges departing the mine site. Robinson Point just two miles to the North of the barge loading dock will obscure this emerging barge traffic from southbound traffic following the Traffic Lanes.

The traffic lanes off Robinson Point are extremely close to the shoreline; and deep draft vessels often transit this area in excess of 20 kts. It is also important to note that there is a VTS "radar shadow" near the shoreline just to the south of Point Robinson. This shadow often causes the automatic tracking function of the VTS to drop track; and sometimes the VTS will lose radar image of the vessels altogether. However, the vessel track and/or radar image is quickly regained once it departs the shadow.

The elevated risk to tugs/barges departing the mine site will be mitigated through the full participation of the tugs with the VTS. Through timely reporting of their Sailing Plan and Position Reports as required by 33 CFR 161.19 the VTS will be able to provide valuable traffic advisories to the departing Tug. If the tug were to choose a course of action that the VTS deemed to be unsafe, the VTS has the authority to issue the Tug a direction under 33 CFR 161.11. For example, the VTS could direct a tug/barge not to get underway until traffic within the Traffic lanes had cleared Point Robinson.

It is also important to note that the Robinson Point Area can have significant recreational boating and fishing activity. Most of these vessels are less than 40 meters, and thus are not actively participating with the VTS. Furthermore, due to their size and construction, they are often not detected by the VTS radar. This activity could be of particular concern during periods of reduced visibility. The EIS does not specify whether the barges will be towed astern or alongside. If towed astern, the process of making up the tow and playing out the tow wire could cause additional conflict with these vessels.

In section 8.3.2.3 you state that the Coast Guard regulates vessel speed to reduce wakes when tide levels are at or above 11 feet. This statement is somewhat misleading. It is true that VTS participants are advised when the tide level is at or above 11 feet. However, the VTS does not actually regulate vessel speeds. Rather, it is up to the professional mariner to take this information under consideration, and to adjust speed accordingly to minimize excessive wake when appropriate. Given the close proximity of the existing traffic lanes, it may be impracticable to totally eliminate wakes from passing ships in the vicinity of the gravel barge loading facility. This factor should be taken into consideration in the design of the barge mooring facility.

Attached is a summary of all tracked VTS participants who transited either East Passage or Colvos passage from April 1999 till April 2000. VTS participants are typically all vessels over 40 meters and all tugs when towing a barge; however smaller vessels may on occasion be tracked. Over 97% of vessels which participate with the VTS transit East Passage; while approximately 47% of Tugs and Barges choose to transit East Passage. This translates to approximately 13.4 transits/day past the mining site on Maury Island; 6.3 vessel transits/day and 7.1 barge/tug transits per day. This assumes a uniform distribution of transits over time. Although we have not done a detailed analysis; it is the expert opinion of my VTS watchstanders that there are specific days, and specific times of day when traffic in East Passage is significantly higher or lower than the average. This is presumed to be due vessel trading patterns and various economic considerations.

In summary, I am confident that Vessel Traffic Service Puget Sound has the ability to safely handle the modest increase in barge traffic described in the EIS. The Tugs involved in this operation will be required to fully participate with VTSPS as required by the National VTS Regulations contained in 33 CFR 161. In addition, they will be required to abide by the letter

and spirit of the Collision Regulations; particularly Rule 10 which governs vessel action in or near the Traffic Lanes. In a worse case scenario, VTS Puget Sound has the legal authority to direct a barge not cross the shipping lane or to depart the dock until it is deemed safe to do so. The ability of the VTS to safely manage this operation will need to be reconsidered if the actual barge traffic is greater than the 8 transits per day proposed in the EIS.

I am providing a copy of this letter to both the Puget Sound Pilots and the Puget Sound Marine Committee (PSMC). These groups may have additional comments or concerns regarding the impact of this proposal on maritime safety. PSMC is a regional forum for identifying, assessing, planning, communicating and implementing operational and environmental measures that promote safe and efficient use of Puget Sound. With representatives from practically every waterway user group, PSMC is in a unique position to comment on the safety impacts of this proposal.

If you have any questions concerning this issue, please contact LT Chuck Alcock at 206-217-6040.


G. F. GREENE

Copy: US Coast Guard Captain of the Port (COTP)
President, Puget Sound Pilots Association
Chair, Puget Sound Marine Committee

Encl (1): VTS Vessel Transit Statistics

VTS Vessel Transits
1 April 99 thru 31 Mar 00

	Colvos Passage	East Passage
Deep Draft - General	47	1862
Deep Draft - Oil/Haz	4	147
Tow - General	2283	2053
Tow - Oil/Haz	41	533
Gov	43	43
Misc	37	245
Totals	2455	4883

ENCLOSURE (1)